

**SEALED**

**FILED**

JUL 29 2020

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
BY *[Signature]* DEPUTY CLERK

UNITED STATES OF AMERICA

v.

**WILLIAM OLIVER TOWERY**

§ Cause No.:

~~§ INDICTMENT~~

§ **COUNT ONE: 18 U.S.C. § 875(c)**  
§ (Interstate Communications)

§  
§  
§

**THE GRAND JURY CHARGES:**

**COUNT ONE**  
[18 U.S.C. § 875(c)]

On or about December 11, 2019, the Defendant,

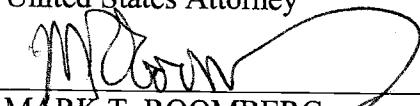
**WILLIAM OLIVER TOWERY,**

did knowingly transmitted in interstate commerce from the Western District of Texas to the Eastern District of Pennsylvania, a communication, that is a text message to a presidential campaign, and the communication contained a threat to injure the presidential candidate coming to the Western District of Texas for a campaign event on or about December 13, 2019, specifically the Defendant communicated the following threat to injure: "I'll be there and have been practicing my sniping skills all month just for this occasion. If you will be nell near him you may want to wear something dark to hide the blood splatter."

In violation of Title 18, United States Code, Sections 875(c).

A TRUE BILL.

  
[REDACTED] FOREPERSON OF THE GRAND JURY

JOHN F. BASH  
United States Attorney  
By:   
\_\_\_\_\_  
MARK T. ROOMBERG  
Assistant United States Attorney

By:   
\_\_\_\_\_  
WILLIAM R. HARRIS  
Assistant United States Attorney